

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK  
DELTA MARINE CO. LTD

Plaintiff,

-against -

07 cv 4824(GEL)

HANGZHOU JINZHAO INDUSTRY CO.

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

LTD., RICHFULL GROUP (HK) LIMITED  
Defendant.

PURSUANT TO RULE 1.3(C) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Robert Portegello a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: James T. Stroud  
Firm Name: Stroud & Do A Professional Law Corporation  
Address: 14541 Hamlin Street  
City/State/Zip: Van Nuys, CA 91411  
Phone Number: (818) 994-0347  
Fax Number: (818) 994-0319

James T. Stroud is a member in good standing of the Bar of the States of California

There are no pending disciplinary proceeding against James T. Stroud  
in any State or Federal court.

Dated: September 16, 2007

City, State: Staten Island, New York

Respectfully submitted,

Sponsor: Robert S. Portegello

SDNY Bar #: RSP8770

Firm Name: Law Office of Robert S. Portegello, P.C.

Address: 108 Main Street

City/State/Zip: Staten Island, New York 10307

Phone Number: (718) 984-6684

Fax Number: (718) 984-6688

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**UNITED STATES DISTRICT  
SOUTHERN DISTRICT OF NEW YORK**

DELTA MARINE CO. LTD

Plaintiff,

- against -

**07 cv 4824 (GEL)**

HANGZHOU JINZHAO INDUSTRY CO.  
LTD., RICHFULL GROUP (HK) LIMITED

Defendant.

**AFFIDAVIT OF  
ROBERT S. PORTEGELLO  
IN SUPPORT OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE**

State of New York )  
 ) ss:  
County of New York )

Robert S. Portegello, being duly sworn, hereby deposes and says as follows:

1. I am counsel for Defendant HANGZHOU in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit **James T. Stroud** as counsel pro hac vice to represent Defendant HANGZHOU JINZHAO in this matter.
2. I am a member in good standing of the bar of the **State of New York**, and was admitted to practice law. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this court.
3. I have known **James T. Stroud** since 2004
4. I have found **James T. Stroud** to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
5. Accordingly, I am pleased to move the admission of **James T. Stroud**, pro hac vice.
6. I respectfully submit s proposed order granting the admission of **James T. Stroud**, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit **James T. Stroud**, pro hac vice, to represent Defendant in the above captioned matter, be granted.

Dated: *September 16, 2007*  
City, State: Staten Island, New York  
Notarized:

Subscribed and sworn before me on this 16 day  
of September, 2007, by Robert S. Portegello, personally  
known to me or proved to me on the basis of satisfactory  
evidence to be the person who appeared before me

Signature *Patricia Holtermann*

Respectfully submitted,

*Robert S. Portegello*  
SDNY Bar: 8770  
Firm Name: Law Office of Robert S. Portegello, P.C.  
Address: 108 Main Street  
City/State/Zip: Staten Island, New York 10307  
Phone Number: (718) 984-6684  
Fax Number: (718) 984-6688

**PATRICIA HOLTERMANN**  
Notary Public, State of New York  
No. 4830379

Qualified in Richmond County,  
Commission Expires 11/30/20 *[initials]*



# THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

October 31, 2007

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, JAMES TRUMAN STROUD, #069449 was admitted to the practice of law in this state by the Supreme Court of California on June 25, 1976; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

State of California County of  
San Francisco

Subscribed and sworn to (or affirmed)  
Before me on this 31<sup>st</sup> day of October, 2007 by  
Kath Lambert

personally Known to me or proved to me on  
the basis of satisfactory evidence to be the  
person(s) who appeared before me.

Signature

A handwritten signature of Kath Lambert over a horizontal line.

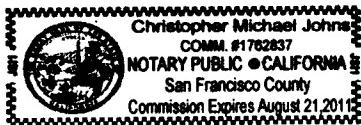
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THE STATE BAR OF CALIFORNIA

A handwritten signature of Kath Lambert over a horizontal line.

Kath Lambert

Custodian of Membership Records



**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

DELTA MARINE CO. LTD

Plaintiff,

-against -

**07 cv 4824 (GEL)**

HANGZHOU JINZHAO INDUSTRY CO.  
LTD., RICHFULL GROUP (HK) LIMITED

Defendant.

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON ORAL MOTION**

Upon the oral motion of Robert S. Portegello attorney for

HANGZHOU JINZHAO INDUSTRY CO.LTD. and said sponsor attorney's affidavit declaration that applicant James T. Stroud is a member in good standing of and that applicant's contact information is as follows (please print):

Applicant's Name: James T. Stroud  
Firm Name: James T. Stroud  
Address: 14541 Hamlin Street  
City /State/Zip: Van Nuys, CA 91411  
Telephone/Fax: (818) 994-0347/ (818) 994-0319  
Email Address: help@strouddolaw.com

Said applicant having requested admission pro hac vice to appear for all purposes as counsel for HANGZHOU JINZHAO INDUSTRY CO.LTD. in the above entitled action;

**IT IS HEREBY ORDERED** that James T. Stroud, is admitted to practice pro hac vice as counsel for in the above captioned case in the United States Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately register for an ECF password at nysd.uscourts.gov. Counsel shall immediately forward the pro hac vice fee to the Clerk of Court.

Dated: \_\_\_\_\_

City, State: \_\_\_\_\_

\_\_\_\_\_  
United States District/ Magistrate Judge

**PROOF OF SERVICE**

STATE OF NEW YORK, COUNTY OF RICHMOND

I am employed in the County of Richmond, State of New York. I am over the age of 18 years and not a party to the within entitled action; my business address is 108 Main Street, Staten Island, New York 10307.

On 11/5/07 I served on the interested parties in this action the document described as:

**Motion to Admit Counsel Pro Hac Vice; Affidavit of Robert S. Portegello in Support of Motion to Admit counsel Pro Hac Vice; [Proposed] Orders to Admission**

— By placing the true copy thereof enclosed in sealed envelope addressed as stated on the attached mailing list.

By placing the original X true copy thereof enclosed in an envelope addressed as follows:

**Richard A. Zimmerman  
233 Broadway, Suite 2202  
New York, NY 10279**

**(BY MAIL)** I caused such envelope to be deposited in the mail Staten Island, New York. The envelope was mailed with postage thereof fully prepaid.

— **(BY FACSIMILE)** I caused the above-referenced document to be transmitted to the following addressee at the following telecopy number:

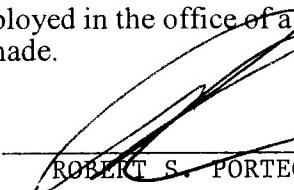
— **(BY PERSONAL SERVICE)** I delivered said document by hand to

I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. It is deposited with U.S. postal service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in this declaration.

Executed on 11/5/07 at Staten Island, New York.

— **(STATE)** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

**(FEDERAL)** I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.



ROBERT S. PORTEGELLO

Declarant

Sworn to before me this  
5th day of November, 2007

  
NOTARY PUBLIC

PATRICIA HOLTERMANN  
Notary Public, State of New York  
No. 4830379

Qualified in Richmond County  
Commission Expires 11/30/2019